

November 4, 2007

Office of Electricity Delivery and Energy Reliability
OF-20 U.S. Department of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

ATTN: Docket # 2007-OE-01
Docket # 2007-OE-02

This letter is my formal request for a rehearing concerning the October 5th 2007 order by the Department of Energy designating two National Interest Electric Transmission Corridors. I fulfill the requirements of a party to the proceedings by virtue of my comments (Comment 81320) filed Friday, July 06, 2007. Because my and many others comments do not seem to have been adequately considered and explored before the ruling to designate NIET corridors was made I respectfully request a rehearing.

It is my contention that the Energy Act of 2005 has been grossly misinterpreted to result in such designations. The intention of the Energy Act is clearly to advance the research, development, and widespread implementation of alternate fuel technologies and conservation efforts in the United States to achieve the desired result of lowering the emissions that are the root cause of our current global warming crises. Numerous sections offer financial incentives to various industries that comply with the intent of the Energy Act. One section particularly addresses electric transmission and the need to update the transmission grid to accommodate and facilitate the integration of alternate energy sources such as wind, solar, geothermal and hydroelectric power. Because the NIET Corridor designations do not take into consideration the current and future locations of alternate energy sources and therefore do not comply with the intent of the Energy Act of 2005, I respectfully request a rehearing.

The misinterpretation of the Energy act began with the addition of FPA section 216(a) requiring the Secretary of Energy to conduct a study of electric transmission congestion and issue a report "which may designate any geographic area experiencing electric energy transmission capacity constraints or congestion that adversely affects consumers as a national interest electric transmission corridor." The designation of NIET corridors that cover geographic areas grossly larger than the areas that are experiencing congestion or capacity constraints is in opposition to rather than compliance with FPA section 216(a), and for this reason I respectfully request a rehearing.

The DOE's own designation order explains that FPA section 216(a); "does not shift to the Department the roles of electric system planners or siting authorities in evaluating solutions to congestion and constraint problems. Transmission expansion is but one possible solution to a congestion or constraint problem. Other potential solutions include increased demand response; improved energy efficiency; deployment of advanced technology; and siting of additional generation, including distributed generation, close to load centers. Nothing in FPA section 216 requires or suggests that the Department should engage in a comparison of the relative merits of these different solutions to easing congestion in a specific geographic area."

The designation of NIET corridors does exactly what the DOE's own interpretation of FPA section 216(a) says it should not do. The current Mid Atlantic Corridor includes areas that neither historically nor in any conceivable future have transmission congestion problems, but do have unutilized generation capacities at outdated, poorly maintained, fossil fuel burning, carbon dioxide spewing power plants such as Hatfield's Ferry. The inclusion of these areas in the NIET corridor essentially puts the DOE's stamp of approval on increasing the use of coal fired electrical generation at outdated plants as the financial benefits to the electric companies operating these plants far outweigh the tax incentives offered them to explore alternate energy and conservation technologies or the costs of siting new 'clean coal' plants nearer to need. For this reason I respectfully request a rehearing.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cindy Maize".

Cindy Maize
903 Thomas-84 Rd.
Eighty-Four, PA 15330